

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347

(302) 658-9200
(302) 658-3989 FAX

ALEXANDRA CUMINGS
(302) 351-9248
(302) 425-4670 FAX
acumings@morrisnichols.com

March 31, 2025

BY E-FILING

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*
No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of the Bolivarian Republic of Venezuela (the “Republic”), Petróleos de Venezuela, S.A. (“PDVSA”), PDV Holding, Inc. (“PDVH”), and CITGO Petroleum Corporation (“CITGO” and, together with the Republic, PDVSA, and PDVH, the “Venezuela Parties”) regarding the Motion for a Short Stay of the Sale Process (the “Motion”) and an Objection to the Special Master’s Recommendation of Stalking Horse (the “Objection”) they filed under seal this afternoon (D.I. 1642 and 1639, respectively), along with redacted versions of the same (D.I. 1645 and 1644, respectively). The Venezuela Parties submit this letter in accordance with the Court’s March 26, 2025 Order directing the parties to file “supporting memoranda justifying [a party’s] proposed redactions.” D.I. 1625 at 6.

The Motion and the Objection were filed under seal because they contain confidential information, namely, confidential information disclosed to the Sale Process Parties by

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the Special Master in the course of his evaluations of the stalking horse bids. The redacted versions of the Motion and Objection narrowly redact that information. The Venezuela Parties respectfully submit that this information should remain sealed pursuant to Paragraph 4 of the Confidentiality Order in this action (D.I. 291). The Venezuela Parties' proposed redactions are highlighted in grey in the sealed Motion and Objection, and the Venezuela Parties are available at the Court's convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Alexandra M. Cumings

Alexandra M. Cumings (#6146)

cc: All Counsel of Record